



COMMONWEALTH OF PENNSYLVANIA
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Honorable Jennifer P. Wilson
United States District Court
for the Middle District of Pennsylvania
Sylvia H. Rambo
United States Courthouse
1501 North 6th Street
Harrisburg, PA 17102

Re: *Ann v. Sheehan v. Shippensburg University, et al.*, No. 1:22-cv-1871

Judge Wilson:

We represent Defendants in the above-referenced matter, and write in response to the April 19, 2024 letter from Plaintiff's counsel, ECF No. 27.

Plaintiff's letter asks this Court for (1) an order compelling written discovery responses from Defendants; and (2) an order extending the discovery deadline (including the deadline to file discovery disputes).

Regarding counsel's first request, we supplied Plaintiff's counsel with written responses to his Second Set of Interrogatories to Shippensburg University earlier today. We also produced 317 documents to him.

Responses to Plaintiff's First Set of Interrogatories to Shippensburg University and Plaintiff's First Set of Interrogatories to Nipa Browder remain outstanding. Draft responses have been prepared and forwarded to the client for review. The client,

however, is currently out of office and not scheduled to return until this Friday, April 26, 2024. We believe we can have those responses finalized and served on Plaintiff's counsel within one week from today—i.e., by Wednesday, May 1, 2024. Those responses would, obviously, moot Plaintiff's first request. So we respectfully request that the Court deny that request.

Regarding counsel's second request, we previously informed Plaintiff's counsel that we would consent to an extension of the discovery deadline. Indeed, we indicated our willingness to discuss a discovery-deadline extension with him one day before he filed his letter on the docket. He did not respond to that offer. In any event, we believe the parties can agree on the length of any discovery-deadline extension—and file a joint motion requesting such extension—without Court intervention. So we respectfully request that the Court deny counsel's second request.

Sincerely,

/s/ Jacob Frasch

Jacob Frasch

Deputy Attorney General

/s/ Francis H. Pryzbylowski

Francis H. Pryzbylowski

Deputy Attorney General